

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Dimitrios Monogios

Case: 2:24-mj-30184

Assigned To : Unassigned

Assign. Date : 5/10/2024

Case No. Description: RE: DIMITRIOS
MONOGIOS (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 18, 2024, May 10, 2024 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C § 922(g)(1)

Felon in possession of a firearm and/or ammunition.

18 U.S.C § 922(g)(o)

Possession of a machine gun.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: May 10, 2024City and state: Detroit, Michigan
Complainant's signature

David Posler, Special Agent-HSI

Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David Posler, Special Agent, Homeland Security Investigations (HSI),
being duly sworn, depos and state under oath that:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) and have been employed in this capacity since May 2022. Prior to this appointment, I was Border Patrol Agent with the United States Border Patrol (USBP) since August 2009. During the time with USBP, I was assigned to the Detroit Station's "DISRUPT" unit for approximately 6 years where I conducted plain-clothes investigations. While also with USBP, I was assigned to HSI as a Task Force Officer (TFO) with HSI Detroit – Guns and Gangs from December 2018 until I accepted my current position with HSI. I am currently assigned to the HSI Detroit - Violent Crime Group.
2. During my employment with the Department of Homeland Security, I have conducted and/or participated in dozens of criminal investigations that involved the possession and use of firearms, armed drug trafficking, and criminal street gangs, in addition to other state and federal offenses. In furtherance of these and other investigations, I have obtained numerous search warrants for residences, vehicles, social media accounts, email accounts, cell phones, and other electronic storage devices.
3. This affidavit is based on my personal observations and knowledge, my

review and analysis of oral and written reports, my discussions with other law enforcement officers, and my training and experience.

4. This affidavit is written in support of a criminal complaint and arrest warrant for Dimitrios MONOGIOS for violations of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and/or ammunition) and 18 U.S.C. § 922(o) (possession of a machinegun).

BACKGROUND ON THE NATIONAL FIREARMS ACT (NFA)

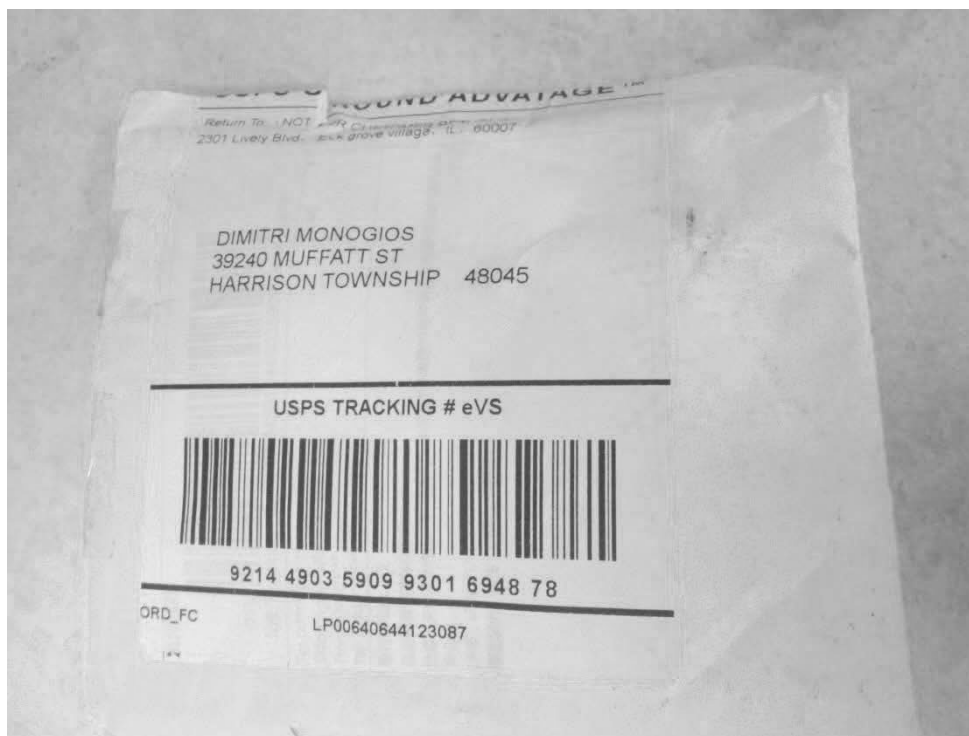
AND NFA WEAPONS

5. Title 18 U.S.C. § 921(24) defines the term “machinegun” as having the same meaning given the term under the National Firearms Act (NFA), Title 26 U.S.C. § 5845(b).
6. According to the NFA, a machinegun is defined as any weapon which shoots, automatically, more than one shot by a single function of the trigger without manual reloading. 26 U.S.C. § 5845(b). In the definition of machinegun, the statute includes, “any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun.” 26 U.S.C. § 5845(b).
7. A Glock conversion device—commonly referred to as “Glock Switch” or “Glock Auto Sear”—is a part, or combination of parts, designed and intended for use in converting a semiautomatic Glock pistol into a machinegun; therefore, it is also “machinegun” under the NFA.

8. ATF is not aware of any Glock conversion device that was developed before May 19, 1986.

PROBABLE CAUSE

9. On April 18, 2024, HSI Detroit received a lead from HSI special agents at the National Targeting Center regarding an international parcel (Shipment # 21483986973; Master Bill # 784-05448866-99301694878; USPS Tracking # 9214490359099301694878) (Subject Parcel) that arrived at the International Mail Facility in Chicago, IL from China. The Subject Parcel was an automatic target for suspected illegal machinegun.



10. The Subject Parcel was opened at the border pursuant to border search authority. Upon examination of the parcel, one (1) Glock Switch was discovered. The package was addressed to Dimitri MONOGIOS.

Photographs of the Glock Switch were provided to HSI along with the shipment packaging.



11. After viewing the images, Special Agent Weston confirmed that the device appeared to be a machinegun conversion device (MCD), colloquially referred to as a “Glock Switch.” An individual can affix a Glock Switch to a Glock-style pistol to make the pistol shoot automatically and function as a machinegun.
12. Law enforcement database inquiries revealed that MONOGIOS has a criminal record. He has been convicted of nine (9) felonies including

“Police Officer – Fleeing – 1st Degree,” “Controlled Substance – Possession (Cocaine, Heroin or Another Narcotic) less than 25 grams,” “Motor Vehicle – Unlawful Driving Away,” “Weapons – Carrying Concealed,” and “Weapons – Firearms – Possession by Felon.”

13. HSI analysts queried the MONOGIOS address in CBP systems for any additional evidence of any international shipments. From June 2020 to May 2024, MONOGIOS has received approximately 27 shipments from China to his address.
14. HSI analysts queried MONOGIOS in LEIN and determined that he has no firearms registered in the state of Michigan.
15. On May 1, 2024, ATF Special Agent Klupacs queried MONOGIOS in ATF databases and observed that MONOGIOS is not a federal firearms licensee and therefore has no license to import firearms into the United States
16. On May 10, 2024, HSI agents executed a search warrant at MONOGIOS’ residence in Harrison Township, Michigan.
17. During the full search of MONOGIOS’ home, agents found the following items in MONOGIOS’ safe located in the living room closet:
 - a. Two (2) firearm suppressors
 - b. Polymer80 Inc. PF940C pistol
 - c. Polymer80 Inc. PF940V2 pistol with STK100 slide
 - d. AR-style pistol with American Flag lower and no stock

- e. AR-style .410 shotgun with collapsible stock and angled foregrip
- f. Green and black camouflage blank pistol
- g. AR-style magazine loaded with .410 shotgun ammunition
- h. Two (2) Tactical Scorpion Gear ballistic armor plates



18. The following items were located in MONOGIOS' living room closet:
- a. Black blank gun with Atak Arms 9mm P.A.K. slide
 - b. Several boxes of ammunition (mixed calibers), including Remington ammunition.

- c. A box of miscellaneous gun parts addressed to MONOGIOS.
 - i. One (1) small bag containing one (1) complete Glock Switch and the two (2) missing parts to the Glock Switch installed on the Polymer80 Inc PF940C found in the bathroom, hidden behind the mirror (further referenced below).





19. SA Klupacs confirmed, based upon the description and review of photographs, that ammunition recovered from MONOGIOS residence was manufactured outside of Michigan and thus traveled in interstate commerce.
20. Law enforcement also located a number of hidden firearms throughout MONOGIOS's residence:
 - a. AR-style rifle affixed with flashlight, green laser and bipod.



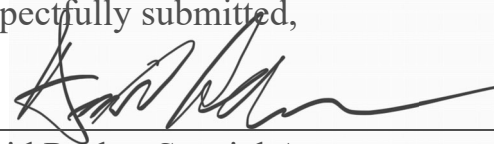
- b. Polymer80 Inc. PF940C pistol with pink slide (loaded with 9mm ammunition) and Polymer80 Inc. PF940C pistol affixed with a partially assembled Glock Switch hidden behind the vanity mirror in the bathroom.



21. Agents interviewed MONOGIOS after the execution of the search warrant. MONOGIOS admitted to having previously purchased a number of Polymer 80 lower kits complete with jig sets, 80% lower receivers, firearm suppressors and Glock Switches. MONOGIOS further stated that he personally completed manufacturing the firearms himself and then affixed various attachments/accessories to them.

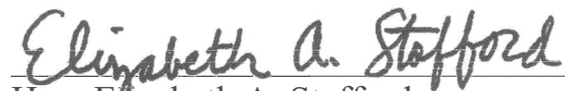
22. Based upon the above, probable cause exists that DIMITRIOS MONOGIOS violated 18 U.S.C. § 922(g)(1), felon in possession of a firearm and/or ammunition, and 18 U.S.C. § 922(o), possession of a machine gun.

Respectfully submitted,



David Posler, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Date: May 10, 2024